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October 25, 2021

**Via ECF and E-mail to CronanNYSDChambers@nysd.uscourts.gov**

Hon. John P. Cronan, U.S.D.J  
Danial Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
Courtroom 12D  
New York, NY 10007-1312

**Re: *Medmarc Casualty Insurance Co. v. Clark & Gentry, PLLC, et al.***  
**Civil Action No. 1:21-cv-07224 (JPC)**  
**LETTER-MOTION FOR 60-DAY ADJOURNMENT OF IPTC**

Dear Judge Cronan:

This firm represents Plaintiff, Medmarc Casualty Insurance Company (“Medmarc”) in the above matter. We write to respectfully request a 60-day adjournment of the Initial Pretrial Conference (“IPTC”) currently scheduled before Your Honor for November 2, 2021, at 10:00 a.m., pursuant to the Court’s Notice of Assignment. (See ECF Doc. No. 14.)

As the Court is aware, this matter was commenced on August 27, 2021, and Summonses were issued for Defendants on September 8, 2021. At this time, Medmarc has effectuated service on Defendant Clark & Gentry, PLLC (“Clark & Gentry”) and Defendant/Interested Party Property & Casualty Insurance Company of Hartford (“The Hartford”). However, Medmarc’s process server was unable to effectuate service on Defendants Edgar C. Gentry, Jr., Celia R. Clark or the Law Offices of Celia R. Clark, PLLC. We understand that the Mr. Gentry and Ms. Clark have moved and we are in the process of serving them at their current residence. Further, we are in the process of re-serving the Law Offices of Celia R. Clark, PLLC via Mr. Gentry and Ms. Clark’s current residence.

The original date for the IPTC is November 2, 2021. The reason Medmarc requests this 60-day adjournment of the IPTC is because service has not yet been effectuated service on Defendants Edgar C. Gentry, Jr., Celia R. Clark or the Law Offices of Celia R. Clark, PLLC. The relief requested herein has not been previously requested. Counsel for Clark & Gentry consent to this request. Medmarc has not yet been contacted by counsel for The Hartford, therefore, it has not had an opportunity to request consent to adjourn the IPTC. If the adjournment is granted, we will advise all parties of the new date immediately upon initial contact with counsel.



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We thank Your Honor for consideration of this request. If the Court has any questions with regard to this request, please advise.

Respectfully submitted,

**COUGHLIN MIDLIGE & GARLAND LLP**

*/s/ Patrick A. Florentino*

Patrick A. Florentino

*Attorneys for Plaintiff  
Medmarc Casualty Insurance Company*

cc: Robert Hewitt, Esq., Schwartz Conroy & Hack, P.C. (via email to reh@schlawpc.com)  
*Attorneys for Defendant Clark & Gentry, P.C.*

Plaintiff's request is granted. The initial pretrial conference scheduled on November 1, 2021 is adjourned to January 4, 2022 at 9:30 a.m. with the parties' proposed case management plan and joint status letter due by December 28, 2021. At the scheduled time, counsel for all parties should call 866-434-5269, access code 9176261.

SO ORDERED.

Date: October 26, 2021  
New York, New York

A handwritten signature in black ink, appearing to read 'John P. Cronan', is written over a horizontal line.

JOHN P. CRONAN  
United States District Judge